

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

B.B., a minor, by and	)	
Through his mother and next friend,	)	
OWENA KNOWLES,	)	
	)	
Plaintiff,	)	CASE NO.:
	)	3:06-CV-00715-MHT
v.	)	
	)	
NORINCO a/k/a CHINA NORTH	)	
INDUSTRIES	)	
CORPORATION, et al.,	)	
	)	
Defendants.	)	

MOTION TO EXTEND DEFENDANT'S  
RULE 26(a)(2) DISCLOSURE DEADLINE

COMES NOW one of the defendants, Qiqihar Hawk Industries Co., Ltd., pursuant to the Court's Uniform Scheduling Order and respectfully requests the Court to extend the deadline by which it must disclose its expert witnesses under F.R.C.P. 26(a)(2) by sixty days. In support thereof, movant would show the Court as follows:

1. Movant has consulted all other parties to this action as to whether they agree or oppose said motion. All parties, including plaintiff, agree to the extension request.

2. This is a products liability case involving an allegedly defective shotgun manufactured in China. On January 7, 2008, pursuant to this

Court's Scheduling Order, plaintiff disclosed two liability experts and two damages experts. One of these experts is a metallurgist. Qiqihar Hawk has also retained a metallurgist who resides in Houston, Texas. Qiqihar Hawk will need to coordinate with plaintiff to send the subject shotgun to Texas in compliance with all federal regulations governing the transport of firearms.

3. The present disclosure deadline is March 3, 2008. This will not provide sufficient time in which to transport the gun to Texas and to have it evaluated by Qiqihar Hawk expert. Moreover, Qiqihar Hawk may wish to retain other experts, such as a vocational consultant, who will need to meet with plaintiff in person in order to formulate her opinions. Scheduling this independent vocational evaluation and allowing time subsequent to the evaluation for said expert to formulate her opinions cannot be done by March 3rd.

4. An extension of sixty days will not interfere with the other deadlines established in the Court's Scheduling Order.

WHEREFORE, Qiqihar Hawk requests the Court to extend the defendant's expert witness disclosure deadline by sixty days.

Respectfully submitted,

/s/Todd M. Higey

Todd M. Higey

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CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the persons listed below:

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